NANC

2003
Pooling Administrator
Performance
Evaluation
Report

Prepared by the
Numbering Oversight Working Group

July 8, 2004

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Executive Summary

The Pooling Administrator (PA) serves under contract to the FCC. The PA's annual performance assessment is based upon results from performance ratings compiled from Performance Feedback surveys, observations and written comments. The NANC's Numbering Oversight Working Group (NOWG) has compiled this data into an annual report for the FCC and the North American Numbering Council (NANC).

The PA's rating for the 2003 performance year was determined by the NOWG to be between "More than Met" and "Exceeded". This rating is defined below:

MORE THAN MET	- Met and sometimes went beyond the requirements for the position. - Sometimes provided more than what was required to be considered fully successful in all aspects of the position. - Performance was more than competent and reliable. - Decisions and recommendations were sound in routine areas, and were frequently sound in the less structured, non-routine areas.
EXCEEDED	Exceeded performance requirements consistently. - Exceeded performance even in the most difficult and complex situation - Taking on responsibility for extra or unique tasks. - Decisions and recommendations were always sound and exceeded requirements in less structured, non-routine areas of responsibilities.

The NOWG believes that PA has successfully addressed many issues during the year 2003. Some issues resulted in changes to the Thousand Block Pooling Administration Guidelines (TBAG) since the situations creating the need for change were unanticipated by the industry and PA.

Some suggested areas for continuous improvement were identified through survey comments, NOWG observations and the PA operational review. Details of those findings, observations, and specific recommendations are included throughout this report. Certain areas for have been suggested for inclusion in a 2004 PA Performance Improvement Plan (PIP).

The NOWG recommends that the following suggestions for this continuous improvement plan be considered by the PA.

- Development and distribution of their Annual Report
- Training to increase staff knowledge of industry guidelines
- Ongoing focus to improve the accuracy of the data that is input into PAS
- Consider a PAS capability that will allow a pass through to the NANPA system for full NXX requests (pool replenishment, dedicated customer or LRN establishment)
- Change the PAS timeout function to more than 15 minutes

The NOWG believes the level of client satisfaction revealed in the survey results is due to the outstanding professionalism, customer service and expertise exhibited by PA personnel.

Section 1.0   Performance Review Methodology

The annual Pooling Administrator (PA) Performance Evaluation is a summary of significant events that were accomplished during the 2003 performance year. In addition to the annual performance review survey process, the Numbering Oversight Working Group (NOWG) interaction with the PA was limited to the change order review process. The NOWG also considered other input for inclusion into this report.

The NOWG will present its preliminary findings to the FCC and PA. The final report will be presented to the North American Numbering Council (NANC) for endorsement and forwarding to the FCC. Subsequently, the NOWG proposes that the PA develop a 2004 Performance Improvement Plan (PIP) and implement it.

Section 2.0   Reports

2.1   PA Annual Report

The Pooling Administrator Technical Requirements document (Section 2.18.1) requires that the Pooling Administrator produce an Annual Report. This document is to be published once a year to report on the status of pooling and Pooling Administration and should coincide with the distribution of the NANPA Annual Report. The annual report is also to be a part of the NANC annual performance review process. The annual report will contain, at a minimum, the following information:

- Highlights/significant milestones reached during previous year
- Identification of existing and potential pooling areas
- Aggregated total by pool of the Service Providers participating in the pooled area
- Forecast results
- System and performance metrics
- Status of transferable Intellectual Property and other required transferable property
- Industry issue identification/feedback
- Volume of reports produced aggregated by regulatory agency, NANC, NANPA and service providers
- Additional offerings

Initially the PA did not have an annual report available for the NOWG to review based on their contractual agreement with the FCC. The PA acknowledged that its 2003 Annual Report has been filed with the FCC. Subsequently the FCC authorized the PA to release its Annual Report to the NOWG; however that review was not completed in time for inclusion in this report.

The PA did provide a copy of the 2003 highlights for the NOWG's review as part of the performance review process. Highlights included:

- Customer Service
- Pooling Administration System (PAS) reliability
- Pooling Implementation

- Performance
- Reorganization

2.2 NANC Reports

The PA reports bi-monthly to the NANC on the status of its' pooling activities. The PA consistently completed and delivered the bi-monthly reports to the NANC in 2003. The NOWG finds that these NANC reports have been thorough and accurate.

Section 3.0 2003 Performance Survey Results

## 3.1 Survey Ratings – Quantitative Analysis

The numerical ratings reflect the degree of satisfaction experienced by respondents within each PA functional area. Respondents provided ratings to questions addressing Pooling Administration, Implementation Management, Pooling Administration System (PAS) and Overall Assessment of the PA. The following charts represent the aggregate of all responses to each of the survey questions. The N/A category only reflects those responses received from Respondents and the aggregated numbers for that category may not reflect the total number of survey respondents because not all respondents provided an answer for either entire sections and/or specific questions. (See Appendix A for the blank 2003 PA Performance Survey and Cover Letter)

Pooling Administration (Section A)

There were 7 questions in this section, which respondents provided ratings that were weighted in the Met and More than Met range. There were over 55 cumulative responses rating the PA's performance as Exceeded.

1. The PA processed by Thousands-Block Application Form (Part 1A) (assignment, modificatin or return) in accordance with the applicable regulations and/or industry Guidelines, for example, processed Part 1A within 7 calendar days.

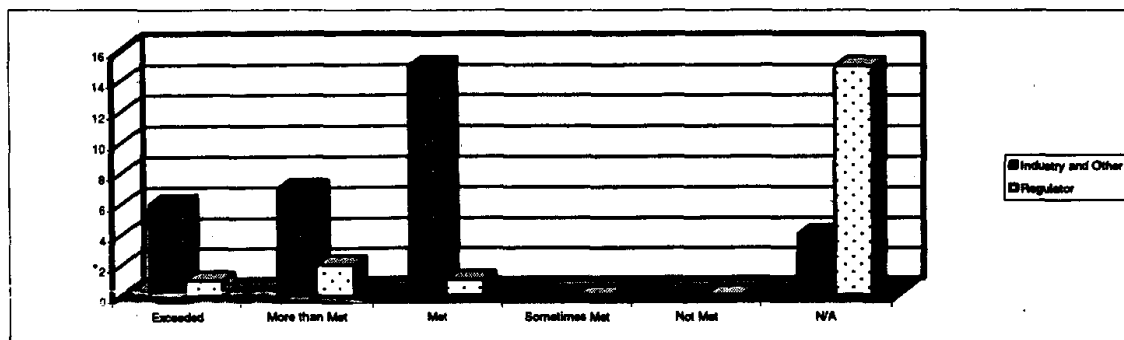|						
Industry and Other	1	14	9	0	0	2
Total	1	14	9	0	0	21
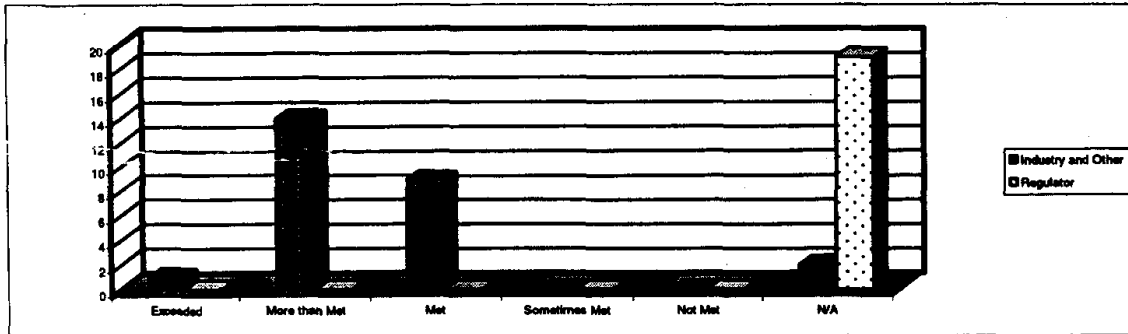
2. When required, the PA forwarded Part 1B NPAC activation or modification request(s) per industry guidelines.

Industry and Other	7	6	13	3	0	3
Total	8	6	13	3	0	21
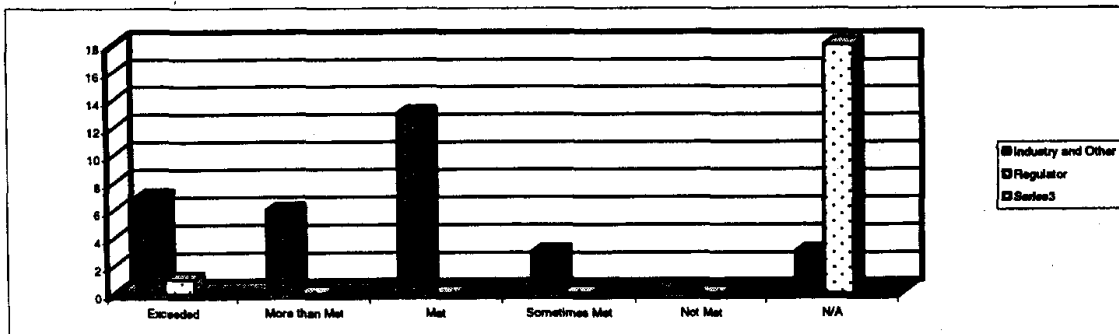
3. The PA forwarded full CO Code NXX Assignment Requests (Part 1) to NANPA per industry Guidelines.

|						
Industry and Other	6	7	15	0	0	4
Total	7	9	16	0	0	19

4. The PA responded to inquiries within 1 business day and when necessary, referred me to the appropriate regulation, guidelines, web site or subject matter expert.

|						
Industry and Other	9	7	8	6	0	2
Total	13	14	11	6	0	7
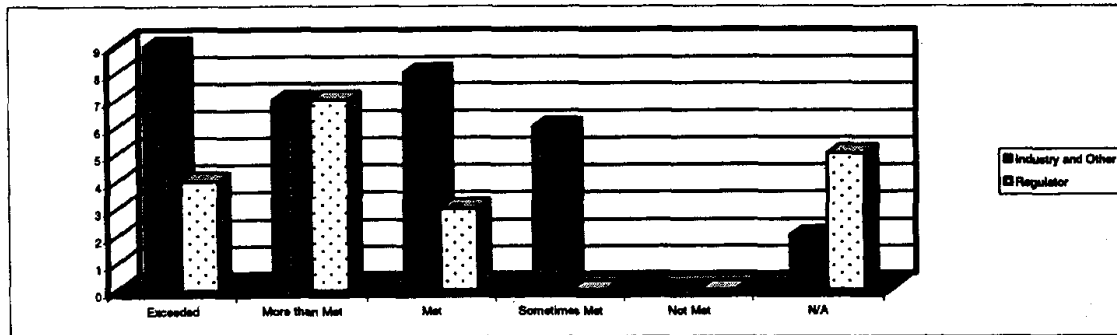
5. The PA demonstrated a consistent and practical understanding of regulations and/or industry procedures governing their actions. If questioned, the PA was able to provide the rationale behind their actions.					
Industry and Other	7	7	11	3	1	3
Total	12	12	15	3	1	8
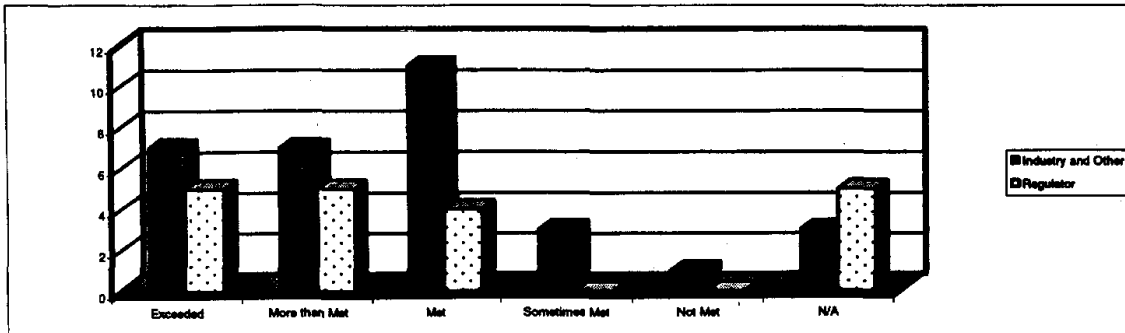
6. The PA followed the reclamation process in accordance with industry guidelines.					
Industry and Other	4	5	11	1	0	11
Total	9	7	15	2	0	18
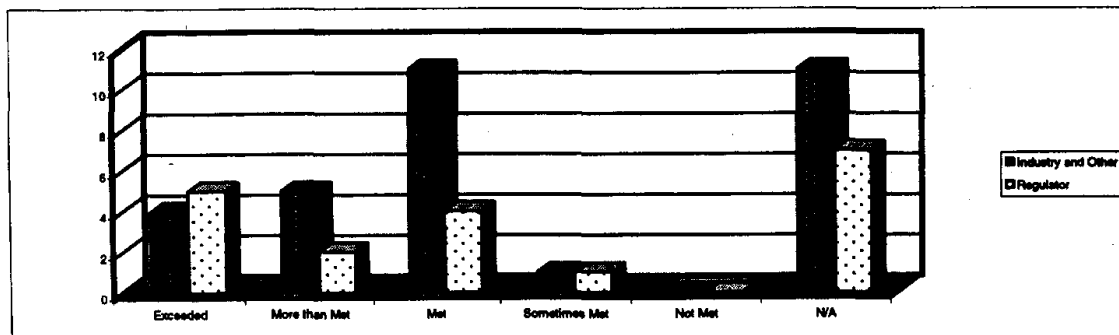
7. The PA processed thousands-block donations in accordance with industry guidelines, for example, accurately.

|						
Industry and Other	7	5	11	2	1	6
Total	9	6	15	2	1	18
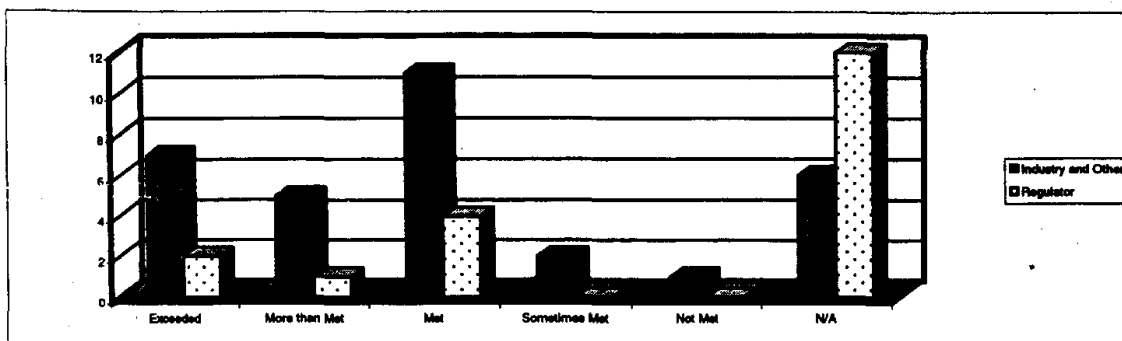
Implementation Management (Section B)

There were 4 questions in this section, which respondents provided ratings that were weighted in the Met and More than Met range. There were over 20 cumulative responses rating the PA's performance in this section as Exceeded.

1. The PIM advised all codeholders and regulatory agencies in the affected NPA(s) of the planning schedule for pooling implementation.

Industry and Other	2	8	9	0	0	11
Total	5	17	15	0	0	20
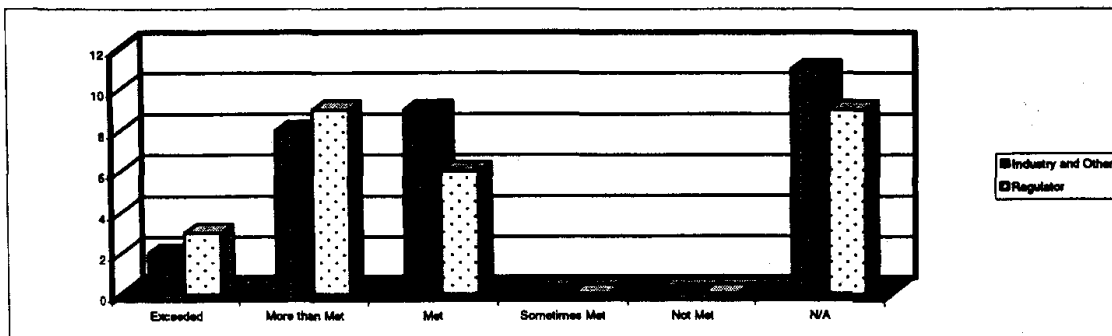
2. The implementation meeting minutes produced by the PIM provided effective direction for SPs to follow for the implementation of poolking according to the timeline developed at the meeting.

Industry and Other	2	6	9	0	0	14
Total	6	10	15	0	0	27
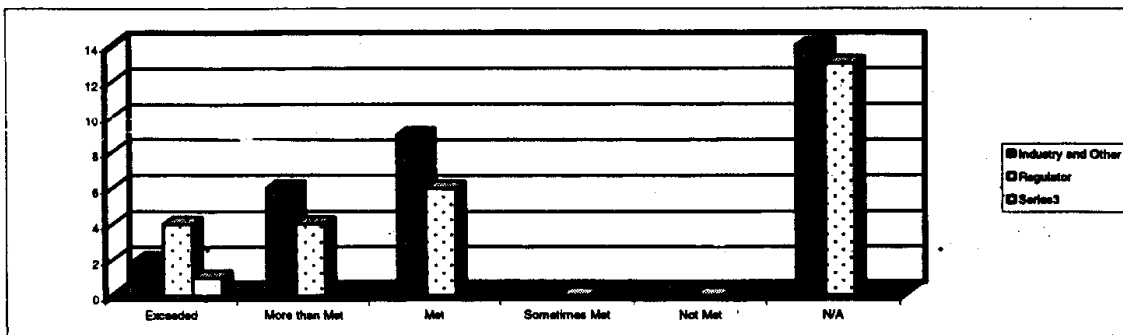
3. The PIM demonstrated effective facilitation skills in the implementation meetings.

Industry and Other	1	7	7	0	0	16
Total	6	10	11	0	0	31
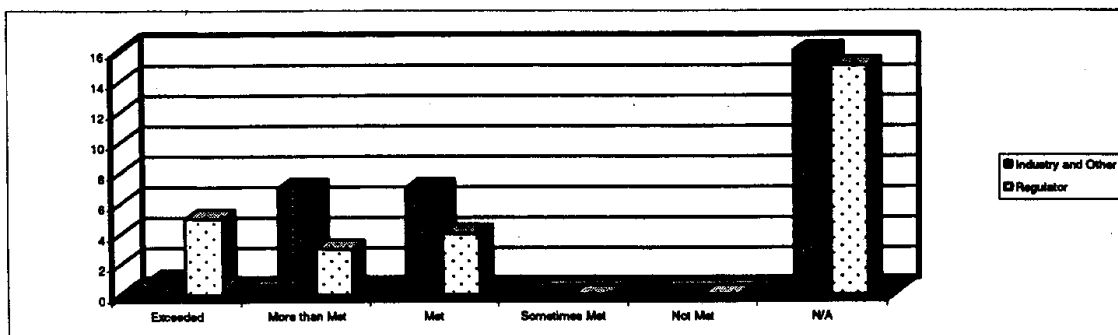
4. The PIM responded to implementation inquiries within 1 business day and when necessary, referred me to the appropriate regulation, guidelines, web site or subject matter expert.

Industry and Other	1	5	5	0	0	20
Total	5	7	5	0	0	37

Pooling Administration System (PAS) (Section C)

There were 4 questions in this section, which respondents provided ratings that were weighted in the Met and More than Met range. There were over 25 cumulative responses rating the PA's performance in this section as Exceeded.

1. PAS is always accessi ble to submit my request(s).

Industry and Other	8	8	12	3	0	1
Total	9	10	14	4	0	14

2. PAS allows me to interact with the system efficiently to request numberings resources, input forecasts and extract reports.

Industry and Other	7	7	11	5	0	2
Total	7	12	14	6	0	12
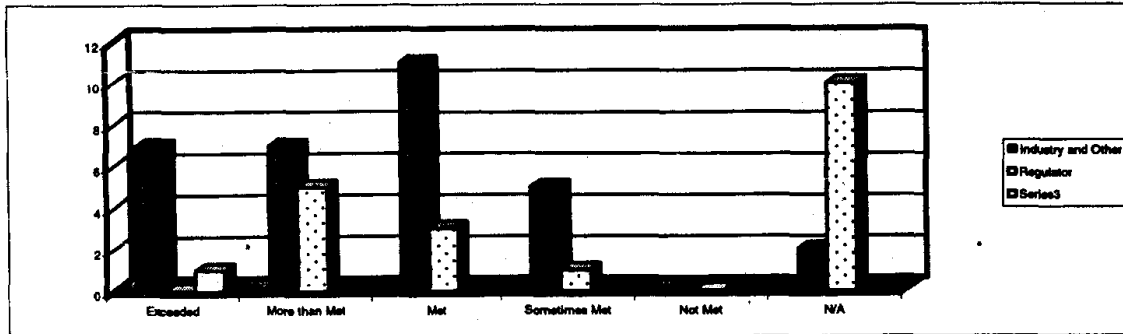
3. PAS allows me to make changes to my application/form prior to submission.

Industry and Other	7	8	13	1	2	1
Total	7	8	13	1	2	20
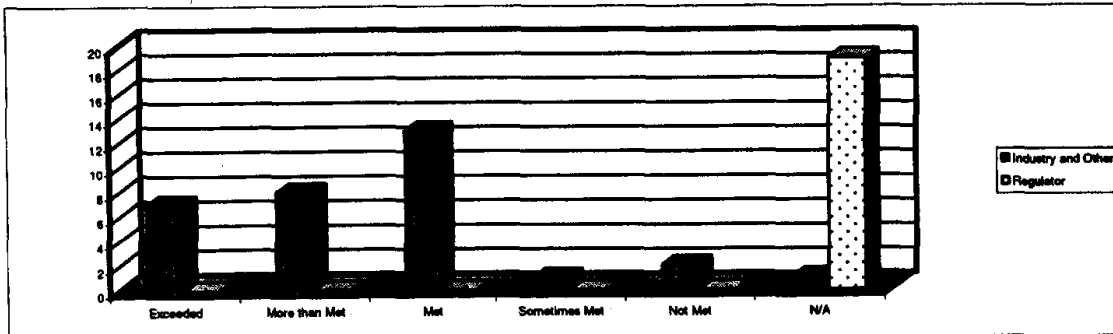
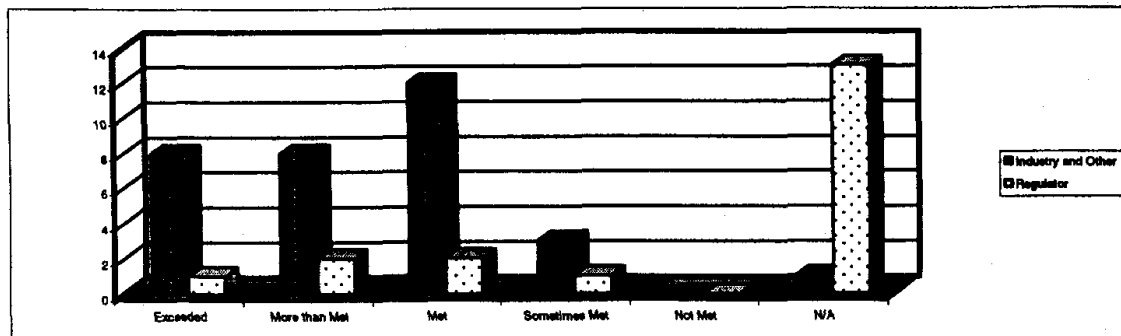| 4. PAS data was easily accessible and accurate, for example, NPA, rate center, blocks assigned, blocks/available.						
Industry and Other	6	7	11	6	1	1
Total	7	13	19	7	1	4
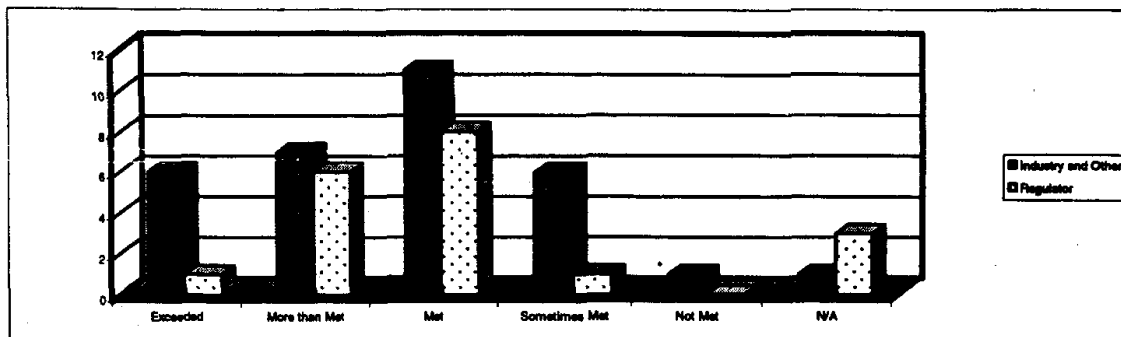
Overall Assessment of Pooling Administrator (PA) (Section D)

There were 8 questions in this section, which respondents provided ratings that were weighted in the Met and More than Met range. There were over 90 cumulative responses for this section rating the PA's performance as Exceeded.

1. The PA website is accessible and information is kept up-to-date e.g. Blocks Assigned, Blocks Available.						
Industry and Other	6	9	10	6	1	1
Total	7	17	19	6	1	2
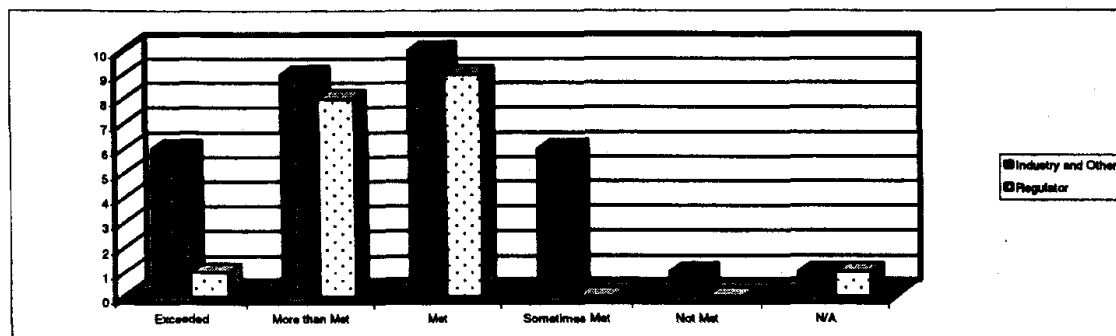
2. The PA web site assisted me with locating information.

Industry and Other	8	4	17	3	0	0
Total	10	8	29	3	0	1
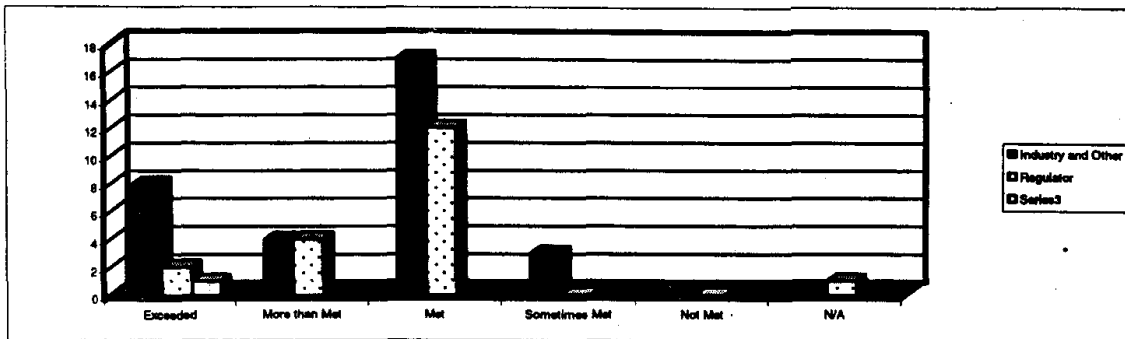
3. The PA representative(s) provided good customer service and helpful assistance.

Industry and Other	14	9	5	4	0	0
Total	20	18	8	4	0	1
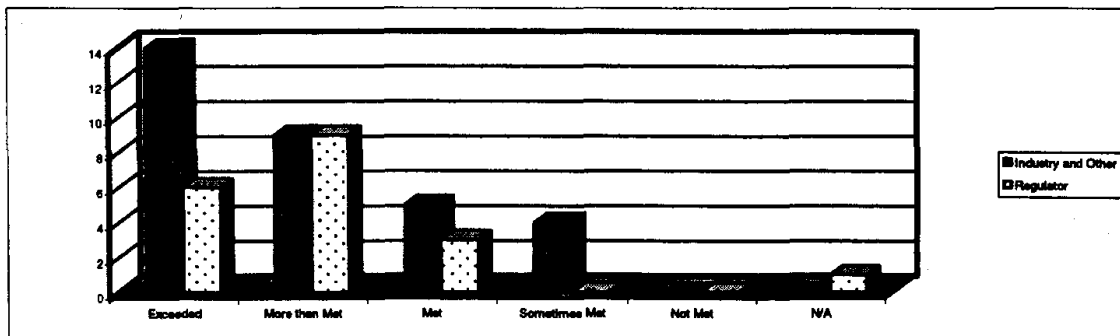
4. The PA provides timely notification when changes are made to PAS as a result of changes made to the final INC guidelines and forms.

Industry and Other	8	9	12	1	0	0
Total	12	14	16	1	0	3
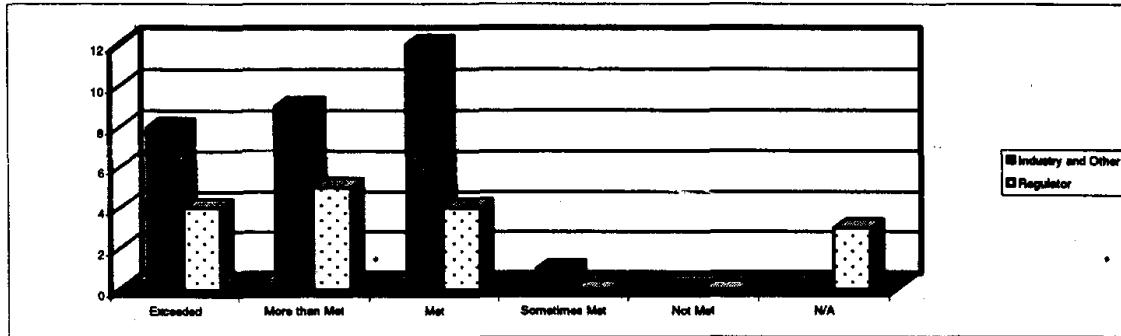
5. The PA representative(s) was responsive and cooperative when participating in the resolution of complaints.

Industry and Other	9	7	7	3	0	6
Total	13	11	7	4	0	16
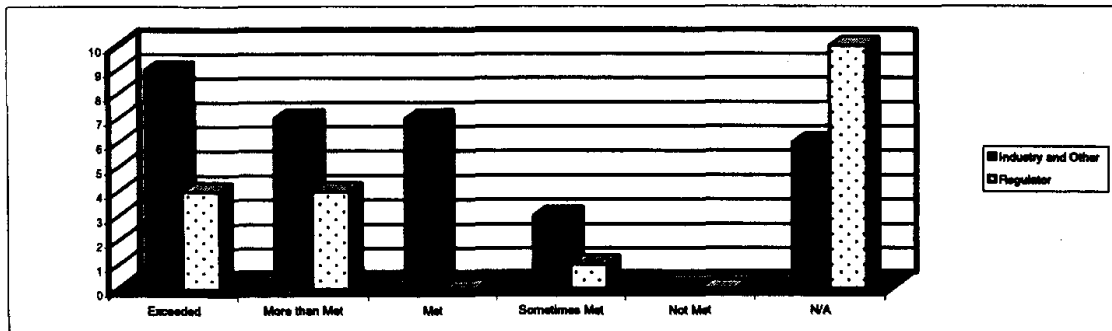
6. The PA representative(s) sufficiently participates and contributes to the resolution of industry issues at industry forums.

Industry and Other	6	7	11	0	0	8
Total	9	12	14	0	0	16
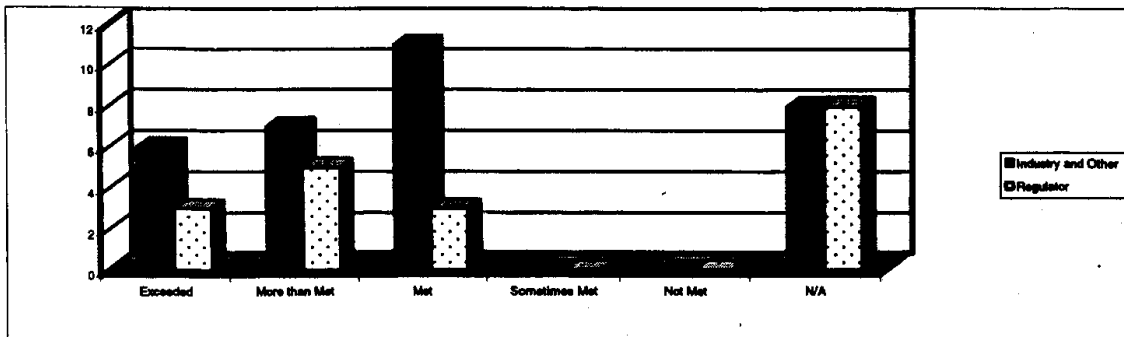
7. PA Help Desk Support is provided in a timely and effective manner.

Industry and Other	10	6	13	2	0	1
Total	12	10	16	2	0	8
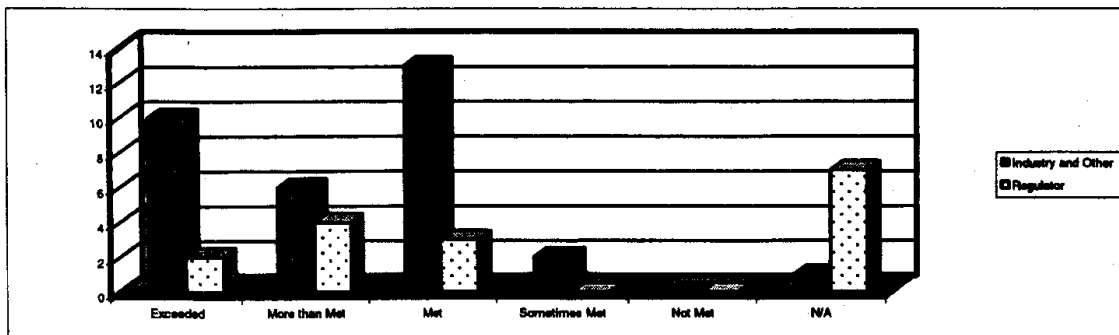
8. Overall, how would you rate the PA's performance based upon your experiences this past year?						
Industry and Other	9	8	13	2	0	1
Total	14	15	20	2	0	1
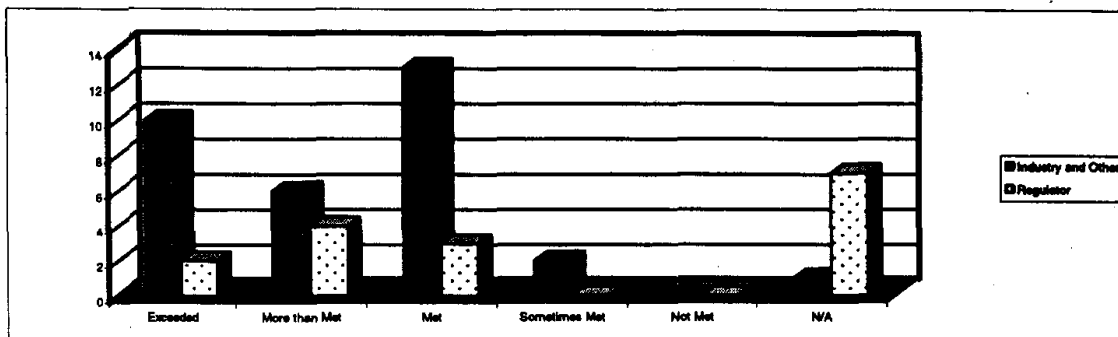
3.2   Written Comments

The survey provided respondents the opportunity to provide detailed written comments of the PA's performance in 2003. There were positive comments as well as comments that indicated suggested areas of improvement for the PA. Following is a summary of the comments by survey section. (See Appendix B for Survey Results – Comments)

3.2.1   Pooling Administration – Section A

Comments from Service Providers and Regulators indicated that the PA was being very helpful, professional, and consistently processed applications within 3 days or less.

There were also comments that suggested areas of improvement. These included:
- improvement in knowledge of guidelines,
- more timely input of PA information into BIRRDS as delay prevents SP from completing their input process,
- accuracy of block data PA maintains in PAS, pass through of information to NPAC, and
- timely response from PA on return of phone calls and email.

3.2.2   Implementation Management – Section B

There were very few comments for this section as pooling implementation was completed in December 2003. The comments received were again complimentary and also provided suggestions for improvement.

Suggested improvements included:
- better facilitation to move the meetings along since little changed from meeting to meeting, and

- clearer definition on the PA's and the SP's responsibility.

3.2.3 Pooling Administration System (PAS) – Section C

There were several affirmative comments about PAS but there were also a significant number of comments with concerns and suggestions for PAS improvements.

Positive comments included recognition that PAS is a very comprehensive system with a significant amount of functionality and that it had a limited amount of downtime.

Comments that identified concerns and or suggested improvements include:
- timeout function in PAS is too short,
- unable to make changes on an application once the next/submit button is clicked,
- pass through capability between PAS and CAS when either replenishing the pool or ordering full code,
- inconsistency between available and donated blocks, duplicate rate centers in PAS,
- 6 month supply of numbering resources is not always available in rate centers,
- FTP does not provide error notification of issues with .xml files when filing forecast, and
- difficult and cumbersome to obtain historical data, and be more efficient if reports were in Excel format.

3.2.4 Overall Assessment of Pooling Administration (PA) – Section D

As in the other sections, there were positive comments, areas of concern identified and suggestions for improvement.
Positive comments included:
- the PA is performing a great job,
- good customer service, PAs are responsive, and
- Help Desk was helpful and PA website has been helpful.

Comments that identified areas of concern or contained suggestions for improvement included:
- blocks returned after assignment because they were greater than 10% contaminated were placed back in the available block pool and need capability to view Part 4's that are due in a specific month.

3.3 Conclusion

Overall, the PA successfully addressed many concerns from Service Providers and Regulatory authorities. The PA should, however, work at increasing their staff knowledge of industry guidelines. Additionally, attention should be given to the accuracy of the data that is input into PAS by the PA to ensure data integrity (e.g. rate center and NPA data) as several survey respondents noted problems with PAS data in their comments.

The PA should use the comments from the Service Providers and Regulatory authorities as a tool to develop a Performance Improvement Plan for 2004.

Section 4.0   Operational Review

The NOWG members met with the PA representatives in Concord, CA on March 13 – 15, 2004 to conduct the first pooling operational review. During this operational review, the PA presented highlights and an overview of 2003 activities, Pooling Implementation Management Activities, Pooling Administration Operations, External Relations and Change Orders, and Regulatory and Compliance. In addition, demonstrations of the PAS system which included a review of all of the available reports and a comprehensive review of the Number Pooling web site, were presented. PA presentations shared at this meeting can be found in Appendix C.

Some of the highlights presented to the NOWG were:
- Implementation meetings
- Pool Management with issuance of the 4th NRO order
- Database creation and management
- Wireless porting
- Personnel changes
- The PA continued to maintain excellent customer service throughout the year

4.1   Pooling Implementation Management

The PA presented the following activities during its presentation:
- Delivered consistently high quality service
- First Implementation Meetings were held January through July
- There were 36 separate meetings covering 49 NPAs
- All NPAs covered by the national rollout were implemented as of December 12, 2003

4.2   Pooling Administration Operations

The PA presented the following activities during its presentation:
- Issued 43,473 Part 3's in 2003, which included approved, denied and suspended requests.

Consistently reviewed methods and procedures by:
- Monthly M&P training
- Reviewing new M&P's at weekly staff meetings
- Quarterly M&P review
- Documents internal processes as it relates to the INC guidelines and regulatory orders
- Provides pooling customer support help desk Monday through Friday, 5 a.m. – 5 p.m. PT

Implemented Pooling Administration Tips of the Month in July 2003

The PA initiated their own performance survey which was distributed to the Regulators and SPs in the 1st and 2nd quarter of 2003. The survey focused on the following six areas:
- Pooling Administrators
- Pooling Implementation Managers
- Customer Service Representatives (Help Desk)
- Pooling Administration System

- Regulator's Only
- Overall Satisfaction

4.3   External Relations

The PA presented the following activities during its presentation:
- Liaison to the NOWG
- Works with various industry groups such as NANC, IMG, LNPA WG, WNPO, INC, CIGRR
- Industry contact for pooling issues
- Insures correct and timely billing to the FCC

4.4   Change Orders

The PA presented the following activities during its presentation:
- Nine (9) change orders were sent to the FCC in 2003
- Of the ten (10) change orders approved in 2003 by the FCC the 1st implementation phase happened in November 2003

4.5   Regulatory and Compliance

The PA presented the following activities during its presentation:
- The Regulatory and Compliance manager ensures NeuStar PA's compliance with FCC mandates, rules, orders and State rules, orders and Industry guidelines.
- Coordinates and compiles monthly, quarterly, semi-annual, annual and any requested ad hoc report.
- Keeps NeuStar PA abreast of any federal and state regulatory, compliance, media and public relations issues.

4.6   Summary of PA Operational Review

With the change of the assignment practice to thousands block pooling, the emphasis on numbering resources has shifted to NeuStar's Pooling Administration. It appears from their presentations, shared at the operational review, the PA is able to consistently maintain their high level of performance weighted against the volume of block and data requests.

Section 5.0   Change Orders

In 2003 the PA filed nine (9) change orders with the FCC. These change orders covered modifications to PAS. PAS changes are a result of issues brought to final closure at the Industry Numbering Committee (INC), recommendations from the Local Number Portability Administration (LNPA) Working Group, or from Service providers that submit suggestions for improvement. For example, two (2) of the nine (9) change orders were initiated as a result of suggestions to the PA from Service Providers. The PA change order process complies with FCC contractual requirements set forth in Attachment B, Section C, Thousands-Block Pooling

Contractor, Technical Requirements, November 30, 2000, Section 2.5 "Changes in the Environment".

The NOWG was tasked with reviewing and analyzing the PA's Change Orders to produce a recommendation to the FCC and the NANC regarding acceptance or rejection of the proposed PAS changes. The NOWG worked with the PA to clarify processes and procedures contained in the change orders as well as working with the PA to develop alternative approaches that would provide a broader benefit to the industry. The PA was always prompt and knowledgeable in responding to questions relating to the change order(s) from the NOWG.

The following is as summary of the 2003 Change Orders:

- November 2003, the PA successfully completed the first implementation phase of change orders that were approved by the FCC in 2003.
- Two (2) change orders were withdrawn by the PA and replaced with revised change orders.
- In 2003 the FCC approved 10 changes orders. It should be noted that four (4) of the approved changed orders were submitted in 2002.
- The FCC rejected/denied three (3) change orders in 2003, all of which were submitted in 2002.

Section 6.0   Systems – PAS

The NOWG reviewed the PA Technical Requirements for PAS published on July 18, 2000 and found no significant discrepancies. There were numerous comments in the PA survey relating to the functionality of PAS and these can be reviewed in their entirety in Appendix B.

PAS has a 15 minute system time out function and it has been suggested by survey respondents that this time limit be extended. During the operational review in Concord, CA the PA noted that a "pop up" window will appear after 10 minutes of idle time to warn the user that their session will expire in 5 minutes. The PA also noted that is a SP has a "pop up" blocker activated, the SP will not receive the session expiration warning notice.

The method in which PAS maintains a six (6) month inventory of blocks available in rate centers is of a concern since there is not always blocks available for assignment.

PAS has a limitation that will not allow a user to update multiple blocks in a NPA/NXX at one time but rather each block must be updated individually.

Although not a technical requirement, it should be noted that there have been comments made that it would be beneficial if PAS had the capability of providing a pass through to the NANPA system for full NXX requests (pool replenishment, dedicated customer or LRN establishment). Today a SP is required to complete and submit a "manual Central Office Code Administration Guideline (COCAG) Part 1" (e.g., a WORD document) for a full NXX request. Additionally, submission of a Part 1b to the PA is also a manual process and not part of PAS. Today a Service Provider must manually complete a Part 1b and email the document to the PA.

There were several areas of concern identified by Survey Respondents in their written comments. It should be noted that while these comments are addressing the PA's functions, the real issue may be one of additional Service Provider education on data input into PAS regarding block management requirements.

Comments expressed concern about:
- the data integrity of the block and donation reports contained in PAS,
- donated blocks not appearing on the donation and/or the available block reports,
- the contamination level of the available blocks (currently there is no way for the PA to indicate how contaminated a donated block may be but it is still the responsibility of the donating service provider to indicate whether or not a block is contaminated, simply a Y or N on the donation form – TBPAG Appendix 2) - PA Change Order #24 addresses this issue,
- when donations were made to initializing pools, the donated blocks were not correctly reflected in BIRRDS™/LERG™ [1] (e.g., donated blocks still had the donating SP OCN on the block record).

Overall PAS appears to be functioning properly and within the FCC's technical requirements.

Section 7.0 WEB Site

The web site maintained by the Pooling Administrator contains a vast amount of information for Service Providers and Regulatory agencies relating to the state of number pooling. The layout of the web site is user friendly which makes it easy to locate information such as block availability, meeting notifications and records, and FCC documents. However there should be a continual review of the information on the main web page to ensure that the information is current.

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[1] ™ Telcordia Technologies, Inc

Section 8.0   Recommendation and Conclusion

The PA Performance Evaluation Rating is based upon observation, documentation and information collected during the year 2003. Although emphasis is given to the numeric and written survey comments, survey respondents may not be familiar with the "behind the scene" activities of PA. The PA's performance when working with the NOWG and NANC, including the progress in addressing PAS Change Orders, are examples of activities, which the average survey respondent may have little or no knowledge of.

It is the opinion of both the NOWG and PA User community who responded to the survey, that the PA achieved between a "More Than Met" and "Exceeded" rating for the performance year 2003.

MORE THAN MET	- Met and sometimes went beyond the requirements for the position. - Sometimes provided more than what was required to be considered fully successful in all aspects of the position. - Performance was more than competent and reliable. - Decisions and recommendations were sound in routine areas, and were frequently sound in the less structured, non-routine areas.
EXCEEDED	Exceeded performance requirements consistently. - Exceeded performance even in the most difficult and complex situation - Taking on responsibility for extra or unique tasks. - Decisions and recommendations were always sound and exceeded requirements in less structured, non-routine areas of responsibilities.

As the emphasis on numbering resources has shifted to NeuStar's Pooling Administration the NOWG believes that the high level of client satisfaction revealed in the PA survey results is due to the perseverance, outstanding professionalism and expertise exhibited by the PA's personnel in the performance of their duties.

As with every service, from time to time there may be a customer who misunderstands the block assignment or donation process or has a bad experience. However, the NOWG has no reason to believe that any other organization would not have experienced the same situations or that there would be any guarantee that another organization would have handled the situations any better than how it was handled by PA personnel.

The PA should use the comments from the Service Providers and Regulatory authorities as a tool to develop a Performance Improvement Plan for 2004.

The NOWG recommends that the following suggestions for this continuous improvement plan be considered by the PA.

- Development and distribution of their Annual Report
- Training to increase staff knowledge of industry guidelines
- Ongoing focus to improve the accuracy of the data that is input into PAS
- Consider a PAS capability that will allow a pass through to the NANPA system for full NXX requests (pool replenishment, dedicated customer or LRN establishment
- Change the PAS timeout function to more than 15 minutes
- Conduct a continual review of the information on the main web page to ensure that the information is kept current and up to date

Section 9.0 Acknowledgements & NOWG Participants

The NOWG wishes to thank the following NeuStar PA employees for assisting the NOWG during the annual operational review.

> Armstrong, Bruce
> Ensminger, Mary
> Hymans, Linda
> Putman, Amy
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> Weber Florence

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The following list contains working group members who have participated in varying degrees in the development of this document.

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O'Donnell, Beth	Cox Communications
Riepenkroger, Karen	Sprint

Section 10.0   List of Appendices

    A. Blank 2003 PA Performance Survey and Cover Letter
    B. Survey Results – Comments
    C. PA 2003 Operational Review Presentations
    D. PA Survey Respondents List

The following appendix has been provided to the FCC, NANPA, and the NANC Chair. It is available upon request to any other interested party.

    E. 2003 PA Survey Responses